

SEALED

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2016 NOV 16 AM 11:33

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID ALEJANDRO RAMOS,

Defendant.

§
§
§
§
§
§
§
§
§
§
§

CRIMINAL NO. SA: 16-cr-00816

INDICTMENT

[In violation of:

18 U.S.C. § 2252A(a)(2)

Receipt of Child Pornography;

18 U.S.C. § 2252A(a)(5)(B)

Possession of Child Pornography]

THE GRAND JURY CHARGES:

SA 16 CR 0816 FB

COUNT ONE

[18 U.S.C. § 2252A(a)(2)]

Between February 2015, and August 2015, within the Western District of Texas, the Defendant,

DAVID ALEJANDRO RAMOS,

did knowingly receive any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped or transported using any means or facility of interstate and foreign commerce,

All in violation of Title 18, United States Code, Section 2252A(a)(2) and (b).

COUNT TWO

[18 U.S.C. § 2252A(a)(5)(B)]

On or about October 22, 2015, within the Western District of Texas, the Defendant,

DAVID ALEJANDRO RAMOS,

did knowingly possess material, specifically, a Raidmax Smilodon Gaming Computer with a Western Digital Hard Drive, serial number WCASYE074762, which contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, and which had been shipped and transported using any means and facility of

interstate and foreign commerce, and was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce, including by computer,

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[Title 18 U.S.C. §§ 2252A(a)(2), and (b), and (a)(5)(B), subject to forfeiture pursuant to Title 18 U.S.C. § 2253(a). See Fed. R. Crim. P. 32.2]

As a result of the foregoing criminal violations set forth above, the United States of America gives notice to Defendant, **DAVID ALEJANDRO RAMOS**, of its intent to seek the forfeiture of the below described property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title

18 U.S.C. §§ 2253(a)(1), (2), and (3), which states:

Title 18 U.S.C. § 2253. Criminal forfeiture

(a) Property subject to criminal forfeiture.—A person who is convicted of an offense under this chapter involving a visual depiction described in section . . . 2252 . . . of this chapter . . . shall forfeit to the United States such person's interest in—

- (1) any visual depiction described in section . . . 2252 . . . of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN JR.,
UNITED STATES ATTORNEY

BY:


TRACY THOMPSON

 Assistant United States Attorney